



Sustainable Energy for All

Whistleblowing Policy



Policy Prepared:	26 August 2020
CEO Approval:	01 September 2020
Administrative Board Approval:	30 September 2020
Date Revised:	02 October 2020
Date Revised:	

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1. Introduction

This Whistleblowing Policy provides guidance on how to raise concerns about malpractice in the conduct of individuals within and those representing Sustainable Energy for All (SEforALL). SEforALL is committed to being open, honest and accountable, and to conducting our business with the highest standards of integrity. The policy aims to ensure that if an individual wants to raise any serious concerns, they can do so with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result.

The Administrative Board has oversight of the effective implementation of this policy and associated procedures and ensuring that everyone linked with SEforALL is equipped and supported to meet their responsibilities.

2. Scope

This policy is mandatory for anyone who works for or on behalf of SEforALL, either in a paid or unpaid capacity and this includes all directly employed staff, consultants, interns, secondees, junior professional officers (JPOs), and volunteers (referred to as “staff”), as well as SEforALL Ambassadors, and Administrative Board members. This policy also applies to partners that SEforALL funds should they not have their own Whistleblowing Policy.

3. Purpose

This policy is primarily for concerns or disclosures where the interest of others or of SEforALL is at risk. Such concerns or disclosures are ones that the individual raising the concern reasonably believes that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:

- criminal offences or unlawful acts
- bribery
- fraud, theft or corruption
- breach of a legal obligation
- abuse of position for any unauthorised reason or for personal gain
- professional misconduct, such as deliberate disregard for SEforALL’s policies and code of conduct
- discrimination against persons because of their race, colour, religion, ethnic or national origin, disability, age, sex, sexuality or class
- health and safety infringements
- safeguarding issues compromising the safety and wellbeing of vulnerable people
- unauthorised use of resources owned by SEforALL or any of its contractors
- deliberate concealment of information tending to show any of the above matters

Concerns may be about members of staff, Board personnel, Ambassadors, partners, suppliers or people who provide services to the public on our behalf.

The above list is of a few examples, but is by no means restricted to that list.

This policy cannot be invoked to:

- deal with matters that are covered by other procedures (e.g. staff complaints relating to their employment are dealt with through our Staff Handbook procedures)

- raise issues that have already been settled through other procedures.

4. Protection when raising a concern

4.1. Protection

The Administrative Board, Chief Executive Officer and Leadership team are committed to this policy. Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds to believe the information disclosed indicates a violation.

All whistleblowers will be treated in a fair way and not be harassed, bullied, victimised or prejudiced as a result of raising a genuine concern. It is contrary to the values of SEforALL for anyone to retaliate against an individual who in good faith reports an ethics violation or a suspected violation of law or regulations that govern SEforALL's operations.

SEforALL will not reveal the whistleblower's identity without their prior permission, unless SEforALL must do so by law. If this is the case, this will be explained to the whistleblower at the time the concern is raised and/ or investigated to enable the individual to decide whether to proceed.

4.2. Anonymous Allegations

Because the whistleblowing individual are protected, SEforALL encourages that they give their name when making allegations or raising their concerns. Concerns raised anonymously tend to be far less effective especially where inadequate information is provided, limiting SEforALL's ability to investigate the matter fully.

If a whistleblower cannot provide their name, SEforALL will decide whether to consider the matter dependent on whether it can carry out an investigation based on the information provided, the seriousness of the matter and whether the concern is credible.

4.3. Malicious Allegations

If an individual makes an allegation that they believe is true, but it is not confirmed by our investigation, SEforALL will not take any action against the individual. However, if the individual makes a malicious allegation that they know is untrue, SEforALL will take appropriate disciplinary or legal action against them.

5. Procedure for raising a concern

Any person who is aware of suspicions, allegations or actual wrongdoing by a staff, Ambassador, funded partner organisation, in any of the countries where SEforALL operates, has an obligation to notify the SEforALL **Compliance Officer**, who is also the Lead Human Resources.

The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct or safeguarding issues or others are investigated and resolved. All concerns should be presented in writing, and give as much information as possible – including any relevant names, dates, places, etc. The earlier a concern is raised, the easier it is to take effective action.

The Compliance Officer keeps a confidential record of all concerns raised and the outcomes of processes followed to resolve. The Compliance Officer will advise the Chief of Staff and the Chief Executive Officer

of all complaints received and the actions taken to address them. The Chief Executive Officer will keep the Administrative Board fully informed of all concerns and cases, providing a quarterly summary of all cases raised, without revealing any specific details – except where allegations of fraud or corruption are found to be substantiated.

The Compliance Officer can be contacted directly via email at compliance@seforall.org or by writing to: Compliance Officer, Sustainable Energy for All, Andromeda Tower 15th Floor. Donau-City-Strasse 6. 1220, Vienna. Austria. Write ' Compliance Officer - Private and Confidential' on the envelope.

If a concern involves the Compliance Officer, or where the whistleblowing individual believes that the Compliance Officer may be biased, the matter should be referred directly to the Chief of Staff, providing justification for why the individual believes this is the case. If a concern involves the Chief of Staff, or where the whistleblowing individual believes that the Chief of Staff may be biased, the matter should be referred directly to the Chief Executive Officer, providing justification for why the individual believes this is the case. External individuals raising concerns must do so through the Compliance Officer using the details above.

If a concern involves the Chief Executive Officer, or if it is that the reporting individual would like to refer the issue to a non-SEforALL staff member, the matter can be referred to a member of the Administrative Board, providing justification for why the individual believes the Chief Executive Officer or any other SEforALL staff member may be biased. The Administrative Board representative can be contacted directly via email at adminboard@seforall.org The representative can also be contacted by writing to: Administrative Board Representative, Sustainable Energy for All, Andromeda Tower 15th Floor. Donau-City-Strasse 6. 1220, Vienna. Austria. Write ' Administrative Board Representative - Private and Confidential' on the envelope, which will be provided for the attention only of the Administrative Board representative.

5.1. Contacting SEforALL anonymously/hotline

SEforALL has a specific email address that an individual can use to contact us confidentially (and anonymously should they wish) about any unethical / illegal conduct / safeguarding / whistleblowing issues: hotline@seforall.org Only the Compliance Officer has access to this email.

6. Deciding whether to raise a concern

There are common feelings or experiences that can be barriers to raising a concern. For example, sometimes concerns are not raised because: it doesn't feel like one's business to do so; it is only a suspicion without hard evidence; it might feel disloyal to colleagues or the organisation; it didn't go according to plan when it was raised previously, or other people had a poor experience of whistleblowing.

It is important to remember, however, that a whistleblower is a witness, not a complainant. The role of the whistleblower is to let the facts speak for themselves and to allow the responsible Compliance Officer to determine what action to take. SEforALL would prefer the individual to raise matters sooner rather than waiting for proof – after all, it is important to consider the implications of not blowing the whistle too.

7. Responding to a Concern

The way SEforALL deals with a concern will depend on the nature of the concern.

Where applicable, SEforALL's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

The Compliance Officer will first make enquiries to decide whether an investigation should be carried out, and if so, how this should be done. The decision may be to hold an informal review, an internal inquiry or a more formal investigation. The concern may be investigated by the appropriate staff and dealt with, or may be referred to the following:

- the police or other statutory authority
- SEforALL's external auditor
- an independent investigator

If the concern or allegation can be handled under any other SEforALL procedure or policy, the process will be followed. For example, if the concern falls more within our grievance, bullying and harassment or other relevant procedures, the individual raising the concern will be informed of this where appropriate.

If SEforALL needs to take urgent action, this will be done before carrying out any investigation.

Should a meeting to discuss the concern be necessary, the whistleblowing individual can be accompanied by a friend, colleague or other representative in whom they have confidence and who understands clearly the need for utmost confidentiality.

The whistleblowing individual will be given as much feedback as is appropriate during the process and in respect of the outcome. However, SEforALL may not be able to tell the individual about the precise actions taken where this would infringe a duty of confidence SEforALL owes to another person.

Upon the conclusion of the investigation, the whistleblower may be asked for their opinion on how well they feel their concern was handled.

Where allegations are made, SEforALL will take careful consideration about the appropriateness of the person continuing to work with or for SEforALL. SEforALL will apply appropriate disciplinary measures to staff in breach of policy.

Some funders require that SEforALL informs them of any Whistleblowing allegations. SEforALL commits to disclose to funding partners who request to be informed, any Whistleblowing allegations, whether proven or not. The concern, having been registered in the Whistleblowing Incident Register will also be immediately disclosed to those funder(s). Sample Incident Register is attached as Appendix 1.

8. Response Timing

Where the concern is not anonymous, the Compliance Officer will contact the complainant to record the details of the complaint and acknowledge the complaint in writing within 5 working days.

The Compliance officer will provide a final written response to the complainant within a maximum of 28 working days setting out the findings of any investigation or inquiry, and how SEforALL has addressed the issue/s. If SEforALL is unable to complete within this timescale, due to further investigations, the complainant should be contacted and informed of how long it will take to resolve the issue. This may be extended to a maximum of 65 working days. The complainant should be informed of the reasons for the delay and a date for completion. Similar response times will be followed for complaints that are not anonymous.

9. Reprisal

SEforALL will not tolerate any form of harassment, bullying, victimisation, coercion, intimidation, reprisal or retaliation or prejudice against anyone who whistleblows, or provides any information or other assistance in a raised concern or an investigation. Any such behaviour may be treated as a disciplinary offence.

10. SEforALL responsibilities

SEforALL will:

- ensure all staff, and Ambassadors have access to, are familiar with, and know their responsibilities within this policy.
- ensure that staff are inducted in our Whistle Blowing Policy as a key part of the recruitment and on boarding process.
- ensure that all partners are informed and in compliance with our Whistleblowing Policy.
- follow up on whistleblowing reports promptly and take action.

11. Working with partner organisations

SEforALL delivers its programmes and activities in partnership, and in some instances may fund partners. If the funded partner organisation does not have an appropriate similar policy in place, then SEforALL's Whistleblowing Policy takes the precedent.

Funded partners commit to ensuring that all cases of suspected and/or alleged whistleblowing incidents which relate to SEforALL are reported at the earliest opportunity to the leadership team member they are working with, or the Compliance Officer. Partners will provide SEforALL with all relevant or requested information to enable an appropriate investigative response.

12. Data Protection and Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with whistleblowing. All sensitive and personal data must be kept confidential (including the names of anyone who makes the report), and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.

13. Monitoring of this Policy

SEforALL commits to monitoring the implementation of the Whistleblowing Policy to ensure its effective application. The SEforALL annual audit process will be used as a tool to identify any compliance and reporting issues in all offices. The Compliance Officer will keep the Chief of Staff and the Chief Executive Officer fully informed of all concerns and cases relating to whistleblowing. This policy will be reviewed every three years and earlier if necessary, especially after any whistleblowing. The Board will maintain oversight of the policy.

14. Appendix 1: Whistleblowing Incident Register

Whistleblowing Incident Register

This form is used to record a single allegation as soon as it is received, whether proven or not. The Compliance Officer will use this information to record into the overall Organisational Incidents Register which incorporates reports on other policy related incidents for reporting to the Administrative Board.

Summarise Whistleblowing Incident Type:	
Date Incident Reported:	
Complainant's Name (person reporting – indicate anonymous if applicable)	
Victim's Name (if applicable)	
How was the issue reported (e.g. email, hard copy report)	
Describe the issue in detail as presented by the complainant	
Explain how the issue was managed - the key steps that were followed.	
What was the outcome & include the date of the resolution	
Has the Whistleblowing procedure worked well? Is there need to revise the Whistleblowing Policy & procedure? Explain.	
Any additional comments	